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Attorneys for Plaintiff John Doe

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

JOHN DOE,

Case No.: 3:15-cv-00617-MO

Plaintiff,

**PLAINTIFF'S MOTION TO SEAL
DOCUMENTS**

v.

THE REED INSTITUTE

(aka, Reed College) and **JANE ROE,**

Defendants.

MOTION

Pursuant to the Court's Stipulated Protective Order, dated September 2, 2015 (ECF No. 49) and pursuant Local Rule 3-8, plaintiff John Doe respectfully moves for entry of an order granting leave to file under seal Plaintiff's Motion to Compel Production of Documents and Supporting Memorandum ("Motion to Compel") and the accompanying Declaration of David H. Angeli In Support of Plaintiff's Motion to Compel ("Angeli Declaration"), as well as the attached exhibits, which are submitted to the Court for in camera review. In support of the motion, counsel for plaintiff states as follows:

Portions of Plaintiff's Motion to Compel and the exhibits attached to the Angeli Declaration contain or make reference to materials produced as "confidential" pursuant to the parties' Stipulated Protective Order (ECF No. 49). Accordingly, plaintiff submits Plaintiff's Motion to Compel and the exhibits attached to the Angeli Declaration to be filed under seal, as required by Paragraph 4 of the Stipulated Protective Order.

A proposed order to file documents under seal is being submitted concurrently herewith.

DATED: March 15, 2016

ANGELI UNGAR LAW GROUP LLC

By: s/ David H. Angeli
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